

February 27, 2023

Dear Honored Co-Chairs Sen. Lopes and Rep. Gresko, Vice Chairs Sen. Hochadel and Rep. Palm, Ranking Members Sen. Harding and Rep. Callahan, Distinguished Members of the Environment Committee:

Position: **Support with Amendments**

The Recycling Partnership is a mission-driven national non-profit dedicated to improving recycling nationwide. We mobilize people, data, and solutions across the value chain to accelerate change and build a better recycling system. We do this through grantmaking, technical assistance, research, and policy engagement. We have been involved in the discussions and negotiations around EPR in states around the country, including in three of the four states that have passed this important policy – CA, CO, and OR.

We recently released research highlighting two important findings on the impact that EPR can have at the state level, using analysis of a diverse set of EPR programs across the world. That research points to the gains that can be made on recycling rates in both low-performing and relatively high-performing states. Additional research undertaken by The Recycling Partnership found claims that EPR would have a significant impact on consumers' grocery bills are simply not credible.

The huge gains in recycling rates that EPR can bring comes through delivery of nearly universal access to recycling, making it as easy to recycle something as it is to throw away. It also supports robust education about recycling, so residents are supported with the information to recycle often and recycle the right stuff, boosting quality of the recycled materials collected and processed by the waste and recycling hauling industry.

Our research shows that this high recycling rate would return hundreds of thousands of tons of recyclable materials to market, reinjecting over \$30 million in lost material value into the economy annually, creating hundreds of jobs across Connecticut – including the waste and recycling industry, which would see business opportunities for their entire sector, both upon implementation and into the future.

That research spotlights examples from around the world of strong and successful EPR programs. Good program design includes creation of a non-profit governed by the companies obligated to pay for recycling. This group, commonly called a PRO, or producer responsibility organization, is required to pay for and administer recycling statewide. In turn, the Department of Energy & Environmental

Protection (DEEP) would be empowered in the law to hold the PRO accountable through multiple enforcement mechanisms. A multi-stakeholder advisory committee would advise the PRO and DEEP on program design and implementation. By setting fees that reward recyclability and penalize packaging that is not recyclable, the PRO can drive source reduction and create a stream of recyclable materials that find their way to robust markets and increase the amount of recycled content included in new packaging.

While the EPR program as laid out in HB 6664 includes some of the key elements required to stand up a strong EPR program, it also includes some provisions that would make implementation and compliance unnecessarily challenging, which is why **we support the bill, but with amendments**. We respectfully propose that the following issues be prioritized during ongoing collaboration on the bill:

- We strongly encourage the establishment of the EPR program with a single PRO to allow for more effective and efficient implementation of this complex measure, before opening the field to additional producer organizations. This is critical to the success of standing up a successful organization tasked with delivering the promise of EPR in Connecticut.
- The section of the bill concerning minimum recycled content could use clarifying language to avoid unintended conflict with similar laws in the region or to inadvertently share confidential company sales data, to name two areas that should receive focus.
- While we applaud the construction of the measure, allowing for goals to follow a study identifying the unique needs for the recycling system across the state, some of the timelines and mechanics could be streamlined.

We believe a well-designed and efficiently implemented EPR program could bring the benefits highlighted to Connecticut residents if policy is enacted this year, with the amendments highlighted above.

The Recycling Partnership stands ready to help support both an effective policy and implementation of a successful EPR program, through convening stakeholders or through more specific feedback. We look forward to engaging again this legislative session.

Sincerely,



Dylan de Thomas

*Vice President, Public Policy & Government Affairs*

*The Recycling Partnership*